

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



August 17, 2011

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at a Reception and Program sponsored by the Maryland Space Business Roundtable (MSBR), and hosted by the National Air and Space Museum (NASM) and NASA on September 14, 2011.

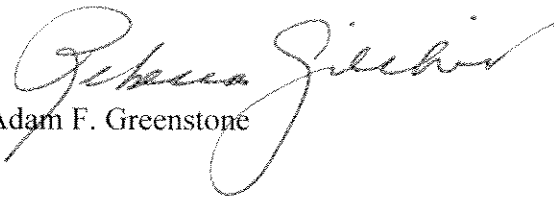
On the evening of September 14, 2011, the Maryland Space Business Roundtable (MSBR) is sponsoring, and NASA and the National Air and Space Museum are hosting, a reception and program at the National Air and Space Museum. The purpose of this event, titled "Earth and Space: A Journey of Wonder and Discovery," is to discuss NASA's future in science. Program participants include moderator Miles O'Brien, a 30-year broadcast news veteran specializing in aviation, space, science, and technology, and Dr. Waleed Abdalati, NASA Chief Scientist, as well as several others.

Among the 1300 guests invited to this event are representatives from the White House (Office of Management and Budget and the Office of Science and Technology Policy), other Federal agencies, professional organizations, educational leaders, local and state government, members of Congress and key staff, science policy leaders, and industry officials. The estimated cost per person for the reception and program is \$85.

Attendance at the reception will allow NASA employees an opportunity to discuss issues of interest to the scientific community, including NASA research and discoveries, with other attendees from other Federal agencies, Congress, academia, and industry. I therefore conclude that NASA's interest in its employees attending this event outweighs any concern that free attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Accordingly, NASA employees whose duties do not substantially affect the MSBR, including employees in non-career positions for which the Executive Order 13490 requires signing an ethics pledge, may accept an invitation for free attendance to the dinner for themselves and their spouses or guests.

NASA employees whose duties substantially affect the MSBR or any of its members, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

for 
Adam F. Greenstone